

IN THE JUSTICE OF THE PEACE COURT
OF EL PASO COUNTY, TEXAS
PRECINCT NUMBER FOUR

MJ REAL PROPERTIES, INC.,

Plaintiff,

V.

DAWN STAR BLAZER, SUCCESSOR
TRUSTEE FOR THE VAL-ELIZ CHILDREN'S
TRUST AGREEMENT DATED DECEMBER
13, 2006 and EL PASO MEMORIALS, INC.,

Defendants.

Cause No. 421-00317-FED

REQUEST FOR WRIT OF POSSESSION

On this 15th day of March 2022, MJ REAL PROPERTIES, INC. (the “Plaintiff”), hereby requests that a **WRIT OF POSSESSION** be issued as follows:

Date of Judgment: December 16, 2021

Premises/Property Address for which Writ is sought:

13451 Montana Ave.

El Paso/Socorro, Texas 79938, as described on Exhibit “A”, attached hereto and incorporated herein.

Plaintiff's Last Known Address:

MJ Real Properties, Inc.

1151 Kessler

El Paso, Texas 79907

Contact Person: Michael Johnson at (915) 590-2444

Defendants' Last Known Addresses:

- (a) Dawn Star Blazer, Successor Trustee for the Val-Eliz Children's Trust Agreement Dated December 13, 2006
200 Wallington Dr., Apt. 95
El Paso, Texas 79902
- (b) El Paso Memorials, Inc.
13441 Montana Ave.
El Paso/Socorro, Texas 79938
- (c) El Paso Memorials, Inc.
13451 Montana Ave.
El Paso/Socorro, Texas 79938
- (d) El Paso Memorials, Inc.
5700 Flager
El Paso, Texas 79938.

Plaintiff tenders the appropriate fee with the filing of this Request. Plaintiff further requests that the Return be addressed to undersigned counsel below.

Respectfully submitted,

MOUNCE, GREEN, MYERS
SAFI, PAXSON & GALATZAN, P.C.
P.O. Drawer 1977
El Paso, Texas 79999-1977
Phone: (915) 532-2000
Fax: (915) 541-1597

By: /s/ Clyde A. Pine, Jr.

Clyde A. Pine, Jr.
State Bar No. 16013460

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I, Clyde A. Pine, Jr., hereby certify on the 15th day of March, 2022, a true and correct copy of the foregoing was forwarded by certified mail, return receipt requested to Michael R. Nevarez, The Nevarez Law Firm, PC, 7362 Remcon Circle, El Paso, Texas 79912.

/s/ Clyde A. Pine, Jr.
Clyde A. Pine, Jr.

Exhibit "A"

Parcel 2: Tract 3-E, Section 26, Block 79, Township 2, TEXAS AND PACIFIC RAILWAY COMPANY SURVEYS, in El Paso County, Texas according to a resurvey made for tax purposes, said tract being more particularly described by metes and bounds in Exhibit "A-1" attached hereto and made a part hereof for all purposes intended, municipally known as 13441 & 13451 Montana Avenue, Socorro, Texas 79938,

Exhibit "A-1"

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A portion of Section 26, Block 79, Township 2, Texas and Pacific Railway Surveys, El Paso County, Texas, and being more particularly described by metes and bounds as follows:

BEGINNING at the corner common to Sections 25, 26, 35 and 36, Block 79, Township 2, Texas and Pacific Railway Surveys, El Paso County, Texas; thence North $0^{\circ} 33' 12''$ West along the boundary line between Sections 25 and 26 a distance of 194.58 feet to a point in the northerly right of way line of the U.S. Highway 62 and 180; thence South $81^{\circ} 15' 30''$ West along said right of way line a distance of 1039.27 feet to the true Point of Beginning of the parcel being described;

THENCE South $81^{\circ} 15' 30''$ West continuing along the northerly right of way line of the U.S. Highway 62 and 180 a distance of 101.03 feet;

THENCE North $0^{\circ} 33' 12''$ West a distance of 580.08 feet to a point in the centerline of a 60 foot wide Road Easement;

THENCE North $89^{\circ} 56' 44''$ East along the centerline of said Road Easement a distance of 100.00 feet;

THENCE South $0^{\circ} 33' 12''$ East a distance of 564.81 feet to the true Point of Beginning of the parcel being described, containing 1.314 acres more or less.

n/k/a

TRACED 3-E